

EXHIBIT A

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RECEIVER'S TIME RECORDS FOR THE PERIOD 5/1/2024 THROUGH 5/31/2024

Date	Description	Time
5/1/24	Review of week ending cash position, obtaining certified checks from banks, correspondence and calls with Five Star bank regarding authorizations, ordering debit cards, checks and limits; Establishing on line banking and view only authorizations; Review of payroll and transfer payroll funds.	3.8
5/1/24	Correspondence and calls with vendors (Winebow, Regional Liquors).	2.5
5/2/24	Set up Quick books accounting with Ms. Snowberger; review of draft Declaration of Defendant attorneys to release Five Star Bank funds obtained from Community Bank; correspondence w/ J. Cucinelli of Ridgemont CC regarding dispute with Defendant Entities, cash management.	4.7
5/3/24	Call with Defendant Entity counsel regarding release of funds motion, review of revised Declaration draft.	1.5
5/3/24	Meeting in home office with K. Mott and Leslie Schoenfeld regarding end of week vendor payments, cash flow projection for following week, discussion with critical vendor regarding payment terms and timing.	3.5
5/4/24	Completion of new bank account set up with Five Star Bank.	1.2
5/6/24	Follow-up on Five Star Bank hold on transactions, removal of hold; follow-up with vendors affected by hold/rejected payments; vendor calls regarding payment processing through Five Star Bank, authorizing vendor payment pulls after Receiver approval; preparation of wire transfers to vendors; review of upcoming vendor payments; discussion with Defendant on vendor payment priorities for the week.	5.5
5/7/24	Vendor calls regarding late payments, cash management and projection through weekend; correspondence with Alliance payroll regarding unpaid payroll taxes.	3.3
5/7/24	Call with Defendant counsel on motion for turnover of Five Star funds, discussion on Ridgemont Country Club operations and review of Food and Beverage service agreement for same; review of motion and Receiver's Declaration, and editing said Declaration and review of final document.	3.5
5/8/24	Review of payroll for weekend, wire transfer and cash management between BCB accounts; communication with Five Star Bank regarding access to Defendant Entities bank statements prior to	6.0

	April 2024; various calls with vendors regarding payment timing; analysis of sales tax payment delinquency and amounts outstanding.	
5/9//24	Call with Receiver attorney's regarding filing of Receiver's declaration; correspondence with J. Cucinelli of Ridgemont CC.	1.2
5/10/24	Correspondence with Kinecta FCU counsel regarding access to Defendant entity bank accounts and request for documentation; call with Receiver counsel regarding engagement and update on Receivership matters.	2.3
5/13/24	Review of Kinecta FCU documents.	2.5
5/15//24	Review of payroll for weekend, wire transfer and cash management between accounts, vendor payment scheduling, cash projection for the week.	3.8
5/16/24	Correspondence with critical beverage vendor to reestablish normal payment mechanisms; other financial management activities regarding cash flow.	1.6
5/17/24	Discussion with Defendant Entities regarding sale of rental property owned by Mott Management; obtained and reviewed initial property appraisals and discussed terms of sale; approved the sale.	2.0
5/17/24	Establishment of Fintec payment portal for participating liquor vendors; review of vendor payable list and prioritization of payments in discussion with management; cash flow projection through weekend and determination of expected cash available; correspondence with State Liquor Authority regarding fingerprinting requirement for licensing; meeting in home office with management of Defendant Entities.	2.5
5/17/24	Meeting in home office with Defendant Entities' management to discuss cash flow matters.	1.5
5/20/24	Call with Receiver's counsel to discuss Defendant litigation proposal.	0.5
5/20/24	Cash management, including vendor calls and management discussion on payment priorities and critical cash flow needs; Numerous calls with vendors on payment expectations.	4.5
5/21/24	Update and discussion with Alliance payroll on unpaid payroll taxes, disability and workers compensation, discussion of ramifications and penalties.	2.0
5/21/24	Financial management activity including sales tax filings and liability, cash flow projections for the week, review of outstanding payables and determination of priority payments and vendors;	4.1

	fingerprinting for State Liquor Authority licensing at IdentiGo location.	
5/22/24	Review of weekly payroll and follow-up with Alliance Payroll and wire transfer; correspondence and discussion with management and counsel regarding sale of rental properties; review of updated appraisal; review of vendor payables and available cash flow.	4.0
5/22/24	Preparation for and call with Receiver counsel and Plaintiff counsel to discuss cash flow needs, inability to pay payroll and sales tax and the critical lack of working capital caused by Plaintiff failure to release post litigation Defendant Entity customer payments.	1.4
5/23/24	Routine financial management activities including cash projection for Friday bill pay.	3.2
5/24/24	Preparation for and meeting with Defendant Entity management at home office; reviewed outstanding invoices for payment, prioritized vendor payments, discussed on going cash shortage and other matters.	2.2
5/24/24	Request to Kinecta FCU for additional information not provided in response to initial request including check and deposit images; discussed same with Receiver counsel; requested, received and reviewed other documentation from Defendant Entity counsel regarding Crescent Beach property and other debt obligations of Defendant Entities.	2.5
5/28/24	Review of Kinecta FCU additional information, various other financial management activities.	2.0
5/29/24	Review of weekly payroll, wire transfer and cash management.	2.0
5/29/24	Preparation of financial sources and uses statement as of 5/15/24; initial preparation of Receivers Report.	3.8
5/30/24	Preparation for and call with Receiver counsel regarding Receiver Report and contents.	1.2
5/30/24	Initial drafting of Receiver's Report to Court.	4.5
5/31/24	Preparation for and meeting with management of Defendant Entities to review end of week bill paying, including priority vendor determination and cash flow projections for the weekend operations.	2.0
5/31/24	Drafting of Receiver's Report to Court.	3.5
	TOTAL	96.0

Total Fees @ \$350/hr	\$33,600.00
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Expenses

Purchase of check binders from Amazon on 5/8/24	\$73.48
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Photocopying and printing – Avalon Buffalo office	<u>\$246.59</u>
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Total Expenses	\$320.07
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TOTAL	\$33,920.07
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Invoice

Invoice No. BJUN240177
Invoice Date 06/18/2024

Syracuse 315-471-3333 Rochester 585-242-9999 Buffalo 716-995-7777 Cleveland 216-592-9999 Tampa 813-221-3266 Omaha 402-885-8800 Grand Rapids 616-251-1212 Detroit 248-955-9200 Phoenix 602-975-4001

Bill To	Ship To
Avalon Buffalo Cash Clients 40 La Riviere Dr, Suite 150 Buffalo NY 14202 United States	Avalon Buffalo Cash Clients 40 La Riviere Dr, Suite 150 Buffalo NY 14202 United States

Terms	Due Date	Client Ref. #	Rep	Contact
Upon Receipt	06/18/2024	Mott Receivership	Buffalo House	Mark Kercher

Item Description	Qty	Amount
Scan - Heavy Stop and Glassword Documents	285	\$85.50 (T)
Load To 8Gb USB Flash Drive	2	\$70.00 (T)
OCR	285	\$14.25 (T)
8.5" x 11" documents printed from file in B&W	285	\$57.00 (T)
Tax (8.75%)		\$19.84
Total		\$246.59

Signature: X_____

By signing this invoice you agree with the balance due for services rendered and the terms of payment. 1.5% interest will be added monthly for invoices not paid by the terms above (18% APR).



- Please note only invoices under \$2,000 can be paid via Credit Card
- Invoices up to \$30,000 can be paid via ACH

Please Pay From This Invoice!

Avalon | 1360 East 9th Street, Suite 150 | Cleveland, Ohio 44114

ar@teamavalon.com 813-683-4944

Final Details for Order #113-0833948-3369862
Print this page for your records.

Order Placed: May 8, 2024
Amazon.com order number: 113-0833948-3369862
Order Total: \$73.48

Shipped on May 8, 2024

Items Ordered **Price**
4 of: *Executive 7 Ring Check Binder, 500 Check Capacity, for 9x13 Inch Sheets, with 6 Year Calendar Organizer, Sleek Business Design, Premium Quality - Black (11703)* \$16.89
Sold by: Quality Business Products (seller profile)
Supplied by: Quality Business Products (seller profile)

Condition: New

Shipping Address:
Mark Kercher
5090 OLD GOODRICH RD
CLARENCE, NY 14031-1515
United States

Shipping Speed:
FREE Prime Delivery

Payment information

Payment Method:
American Express ending in 4008

Billing address
Mark Kercher
5090 OLD GOODRICH RD
CLARENCE, NY 14031-1515
United States

Item(s) Subtotal:	\$67.56
Shipping & Handling:	\$0.00

Total before tax:	\$67.56
Estimated tax to be collected:	\$5.92

Grand Total:	\$73.48

Credit Card transactions AmericanExpress ending in 4008: May 8, 2024: \$73.48

To view the status of your order, return to Order Summary.

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